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April 9, 2004

Mr. Joseph Cosentino
United States Environmental Protection Agency
2890 Woodbridge Avenue, Bldg. 209, Mail Stop 211
Edison, New Jersey 08837

VIA FAX AND U.S. MAIL

RE: Bayonne Barrel & Drum Site, Newark, NJ Progress Report No. 2

Dear Mr. Cosentino:

On behalf of the Bayonne Barrel & Participating Parties and pursuant to Paragraph 23 of the Administrative Order on Consent, enclosed please find three (3) copies of Progress Report No. 2 covering the period from March 1, 2004 through March 31, 2004.

Very truly yours,

de maximis, inc.

William J. Lee

cc: S. Flanagan, USEPA

S. Kehayes, NJDEP

J. Jones, City of Newark

M. Storella, Kirkpatrick & Lockhart

W. Hyatt, Kirkpatrick & Lockhart

D. Reid-Green, BASF

J. Vidumsky, DuPont

BAYONNE BARREL & DRUM SUPERFUND SITE PROGRESS REPORT NO. 2 March 1, 2004 through March 31, 2004

Description of the Actions Taken Toward Achieving Compliance with the Administrative Order on Consent Since the Previous Report:

- A meeting was attended on March 25, 2004 by representatives from EPA (both the Toxics and Removal Sections) the PRP Group, and NJDEP. Discussions centered on the requirements for a risk-based disposal approval pursuant to 40 CFR 761.61 (c).
- The Transportation & Disposal (T&D) plan was prepared by CODE and reviewed and approved as noted by both EPA and the Bayonne Group.
- Office trailers and 24 hour site security was established on-site.
- The demolition permit was obtained as well as the asbestos notification.
- The debris and T&D wastes left on-site by others was being consolidated. Approval for off-site disposal was obtained and these materials were shipped to two different Ohio facilities, Minerva and American Waste (a Waste Management subsidiary). 79 truckloads of this material were loaded and shipped through March 31, 2004.
- Samples were taken from the ash piles, AST #6, the debris piles, sludge residues in trenches, UST's and other points as needed to enable proper characterization prior to disposal. A sample collection log is attached for reference in addition to a site plan.
- The contractor began excavating materials from various pits and trenches throughout the facility. There were quite a few more pits (or trenches) discovered once the rubble strewn all over the site was removed. These materials were segregated and sampled for disposal purposes.
- An air monitoring program was established for the site. A dust action level of 0.15 mg/m3 was set for workers sweeping floors and cleaning pits. Most of this work was performed in Level-C protection. A demolition dust action level of 2.34 mg/m3 was recommended by duPont which will account for levels of lead, dioxin, and PCBs present in site surface soils. The demolition event will be monitored against that criteria.



Mr. Joseph Cosentino Bayonne Barrel & Drum Superfund Site Progress Report No. 2 April 9, 2004

- The asbestos removal sub-contractor mobilized in March and completed removal of friable asbestos. Additionally 53 bags of "dumped" asbestos containing material was discovered and consolidated along with a great deal of loose asbestos materials which were apparently blown off the roof of Building #1. Non-friable asbestos removal also was begun. The majority of this subcontractor's work will be completed by mid-April.
- Pressure washing and cleaning of pits and trenches continued. Following inspections these pits will be either breached or removed.
- Mercury switches and HID bulbs were removed and packaged for recycling or disposal.
- USTs 1 through 4 were excavated and removed. The excavation was backfilled.

Summary of all Results of Sampling, Tests or Other Data Received or Generated Since the Previous Report:

All sampling resulting for purposes of proper disposal options were transmitted under separate cover.

Completed Deliverables Since the Previous Report:

None.

Actions Planned Prior to Submittal of Next Two Reports:

- Complete waste characterization sampling and obtain disposal facility approvals.
- Submit approved copy of the T&D Plan.
- Complete asbestos removal, pursuant to the EPA-approved COP.
- Complete building demolition activities
- Complete removal of above and below ground storage tanks and their contents.
- Submit Progress Report No. 3 May 2004 and No. 4 June 2004.



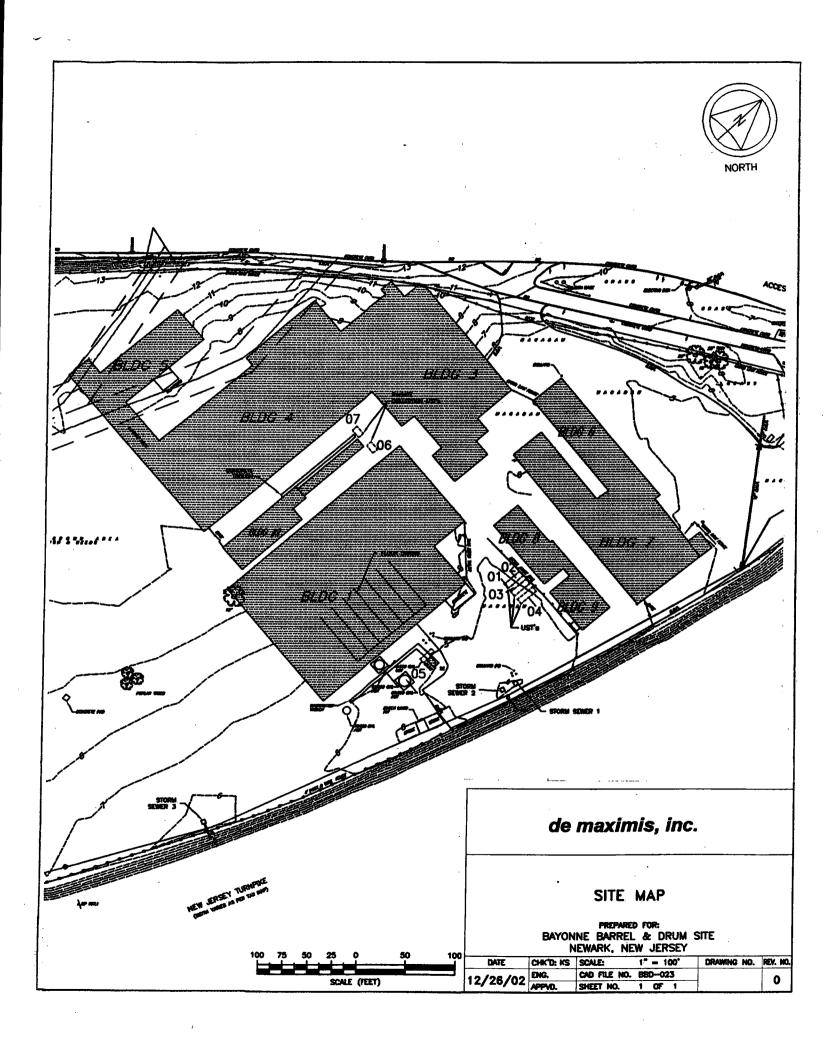
Mr. Joseph Cosentino Bayonne Barrel & Drum Superfund Site Progress Report No. 2 April 9, 2004

Percentage Completion:

Work Plan Submittal and Approval- 90% Construction Operations Plan Implementation - 30% Post-Removal Site Control Plan - 0% Final Report - 0%

Delays Encountered or Anticipated:

None.



SAMPLE COLLECTION LOG

Project Name: Building Decommissioning and Demolition

Contract Number

Site Name: Bayonne Barrel and Drum Site; Newark, NJ

CODE Job No.

628188

Sample #	Date Sampled	Time Sampled	Received Data	Location	Matrix	Analytical Method	Type of Preservation	Collected By	Lab. Report #	Observation
SP-1 Comp	2/18/04	10:25	2/27/04	Ash Pile #1		EPA 8290	4 Deg. C	FA	105346472	Dioxin Sample
SP-1 Comp	2/18/04	10:25	3/04/04	Ash Pile #1		EPA 8260-70, 6010	4 Deg. C	FA	240597.01	Full TCLP, PP+40, RCRA Chars, PCB's
SP-2 Comp	2/18/04	13:20	2/27/04	Ash Pile #2	Soil	EPA 8290	4 Deg. C	FA	105346480	Dioxin Sample
SP-2 Comp	2/18/04	10:25	3/04/04	Ash Pile #2		EPA 8260-70, 6010	4 Deg. C	FA	240597.02	Full TCLP, PP+40, RCRA Chars, PCB's
SP-3 Comp	2/18/04	13:50	2/27/04	Ash Pile #3	Soil	EPA 8290	4 Deg. C	FA	105346498	Dioxin Sample
SP-3 Comp	2/18/04	13:50	3/04/04	Ash Pile #3		EPA 8260-70, 6010	4 Deg. C	FA	240597.03	Full TCLP, PP+40, RCRA Chars, PCB's
SP-4 Comp	2/18/04	14:20	2/27/04	Ash Pile #4	Soil	EPA 8290	4 Deg. C	FA	105346506	Dioxin Sample
SP-4 Comp	2/18/04	14:20	3/04/04	Ash Pile #4		EPA 8260-70, 6010	4 Deg. C	FA		Full TCLP, PP+40, RCRA Chars, PCB's
.SP-5 Comp	2/18/04	14:55	2/27/04	Ash Pile #5	Soil	EPA 8290	4 Deg. C	FA	105346514	Dioxin Sample
SP-5 Comp	2/18/04	14:55	3/04/04	Ash Pile #5		EPA 8260-70, 6010	4 Deg. C	FA	240597.05	Full TCLP, PP+40, RCRA Chars, PCB's

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YA-1 Comp	2/18/04	11:20	2/27/04	Courtyard Area	Soil	EPA 8290	4 Deg. C	FA	105346522	Dioxin Sample
:YA-1 Comp	2/18/04	11:20	3/04/04	Courtyard Area	Soil	EPA 8260-70, 6010	4 Deg. C	FA	240597.06	Full TCLP, PP+40, RCRA Chars, PCB's
BD-WC-AST- 06	2/19/04	12:40	2/27/04	60,000 gal. AST	Sludge	EPA 8290	4 Deg. C	FA	105349864	Dioxin Sample
BD-WC-AST- 06	2/19/04	12:40	3/05/04	60,000 gal. AST	Sludge	EPA 8260-70, 6010	4 Deg. C	FA		Full TCLP, PP+40, RCRA Chars, PCB's
BD-WC-Bldg.3 oils	2/19/04	12:15	i .	Soil/Debris Pile Bldg. 3	Soil	EPA 8260-70, 6010	4 Deg. C	FA	240637.03	Full TCLP, RCRA Chars, PCB's
BD-WC-Bldg.7	2/19/04	11:40		Soil/Debris Pile Bldg. 7		EPA 8260-70, 6010	4 Deg. C	FA	240637.02	Full TCLP, RCRA Chars, PCB's
BD-WC-T01- A	3/9/04	13:10		UST1 Cellusolve Acetate	Water	EPA 8260,608	4 Deg. C	FA	240971.01	TPCH, PCB's, Voa's, TOC & PH
BD-WC-T02-T	3/9/04	13:30	3/16/04	UST2 Toluene		EPA 8260,608	4 Deg. C	FA	240971.02	TPCH, PCB's, Voa's, TOC & PH
BD-WC-T03-G	3/9/04	13:55	3/16/04	UST3 Gasoline	Water	EPA 8260,608	4 Deg. C	FA		TPCH, PCB's, Voa's, TOC & PH
BD-WC-T04-DF	3/9/04	14:25	3/16/04	UST4 Diesel Fuel	Water	EPA 8260,608	4 Deg. C	FA		TPCH, PCB's, Voa's, TOC & PH

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BD-B-001	3/12/04	16:00		Boiler Fire Coating Cement Joint		EPA 600/R- 93/116	N/A	VB	040404283	Non-Asbestos
BD-B-002	3/12/04	16:15	3/15/04	Boiler Fire Coating	}	EPA 600/R- 93/116	N/A	VB	040404283	Non-Asbestos
BD-B-003	3/12/04	16:30	l .	Insulation under boiler jacket	Solid	EPA 600/R- 93/116	N/A	VB	040404283	< 1% Chrysotile
BD-WC- CSWP Comp	3/19/04	13:30	l .	Drummed Paint Chips & Sweepings	Solid	EPA 1311&608	4 Deg. C	FA		Full TCLP, RCRA Chars, PCB's
BD-WC-B2Pits	3/19/04	13:55		Bldg. 2 Pit Sludges	Sludge	EPA 1311&608	4 Deg. C	FA		Full TCLP, RCRA Chars, PCB's
BD-WC-U1	3/19/04	14:45		Drummed White Semi Solid (paste)	Misc. Semi Solid	EPA 1311&608	4 Deg. C	FA		Full TCLP, RCRA Chars, PCB's
BD-WC-U2	3/19/04	15:00		Drummed Clay Absorbent	Misc. Solid	EPA 1311&608	4 Deg. C	FA		Full TCLP, RCRA Chars, PCB's
BD-WC-DW- 01	3/22/04	10:30		Frac Tank Consolidated Waters		EPA 8260&608	4 Deg. C	FA		Full TCLP, RCRA Chars, PCB's
BD-WC-Asphalt anks	3/24/04	13:30		Solidified Asphalt Tankers Comp.	1	EPA 1311&608	4 Deg. C	FA		Full TCLP, RCRA Chars, PCB's
BD-WC-FS-SP	3/29/04	10:35		Floor Sweepings Stockpile	Soil	EPA 1311&608	4 Deg. C	FA		Full TCLP, RCRA Chars, PCB's